

TO GENERAL COUNSEL'S OFFICE

DECLARATION OF LUCILLE HARRIS, UNDER OATH
RESPONSE TO FEDERAL ELECTION COMMISSION FILE NUMBER MUR. 6851
RE: COMPLAINT FILED BY MICHAEL J. BARKLEY, CANDIDATE FOR CONGRESS

THIS RESPONSE IS NOT CONFIDENTIAL AND MAY BE MADE PUBLIC

MAIL TO:

FEDERAL ELECTION COMMISSION
OFFICE OF COMPLAINTS EXAMINATIONS & LEGAL ADMINISTRATION
ATTN: KIM COLLINS, PARALEGAL
ATTN: JEFF S. JORDAN, ASSISTANT GENERAL COUNSEL
999 E STREET, NW
WASHINGTON, D C 20436

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COMMISSION

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OFFICE OF GENERAL
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UNCLASSIFIED

1 Declaration of Lucille Harris in behalf of William & Lucille Harris

2 Declaration in response to Federal Election Commission File # MUR 6851

3 1. Lucille Harris responds, under oath, by this legal declaration as to subject
4 complaint filed by Michael J. Barkley, a complaint dated 6 23 14.

5 2. Subject complaint allegations are false.

6 3. William and Lucille Harris do not now own the property in question,
7 specifically known as 3756 W. Yosemite Lathrop, Ca. 95330

8 Recent chain of title ownership of this property is:

9 1-1-11 William/Lucille Harris transferred property from their individual
10 names to their childrens' trusts, Martin Harris, Marcia Perkins, Melissa King.

11 4-18-11 Harris, Perkins and King trusts transferred their interests to the
12 Harris Irrevocable Trust (aka HIRT).

13 Other parties owning the properties as to undivided, individual interests are
14 three individuals; namely, Kirsten Moorehead, Keeley Duncan, & Connie Liberato.
15 At all times, with property held in individual names, with other parties, the
16 property filed income tax returns under a partnership name known as Mossdale
17 Farms, and does business as a lessor of property under the business name of
18 Mossdale Farms, a partnership. (Exhibit #1)

19 4. None of the Tuff Boy companies have ever held ownership of subject property.

20 5. Two Tuff Boy companies, namely, Tuff Boy Sales, Inc. and Tuff Boy Leasing,
21 LLC, lease approximately 35 acres for purpose of trailer/equipment storage at
22 the site.

23 6. The site whereon the political banners are located has no Tuff Boy
24 affiliation. The site is controlled by the Mossdale Group partners.

25 7. The southerly portion, adjacent to the 120 Bypass, approximately 10 acres,
26 owned and operated by the Mossdale group shown above, is the site upon which
27 banners are displayed. It is herein emphasized that the "Mossdale group"
28 holds title in individual names and in the name of a trust.

1 There is no corporate structure involved with the Mossdale group owners.

2 8. Lucille Harris has been advised that the Mossdale Group has full authority to
3 display political banners of their choosing.

4 9. Political banners now on the property are: Congressman Jeff Denham, Assembly
5 woman Kristin Olsen, Supervisor candidate, Russ Munson. The banners will soon be
6 moved to an adjacent privately owned parcel to abide by local election rules that
7 call for political sign removal subsequent to election dates.

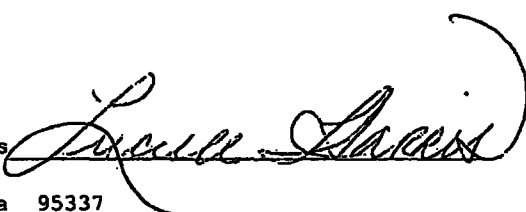
8 10. I have been authorized by the current owners of this property to submit
9 exhibits as necessary to establish ownership identities. (Exhibit #2)

10 11. No donations have been made to the Denham campaigns from Harris parties
11 other than donations from Harris individuals. (Exhibit #3)

12 12. I cite herein that both William and Lucille Harris have long been active in
13 tort reform and lawsuit abuse, specifically through membership and activity
14 through CALA, Californians Against Lawsuit Abuse, and via CJAC, Civil Justice
15 Association of California. In addition, since 1989, the Harris' have long been
16 subjected to wrongful litigation from various sources. Because of such abuse, I
17 am informed and believe that this Barkley complaint constitutes malicious
18 prosecution and civil rights violations. Consequently, I request that the
19 Barkley complaint be denied.

20 13. Should the complaint be pursued, Lucille Harris request such notification,
21 at which time legal council will be retained.

22 14. I declare, under penalty of perjury, that to the best of my knowledge, under
23 the laws of the State of California, and the U. S. Federal government, that the
24 foregoing is true and correct.

25
26
27 Date 7-12-14 Lucille Harris 
28 5151 E. Almondwood Drive Manteca Ca 95337